

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

J.W., a minor, by and through AMANDA
WILLIAMS, Guardian and Next Friend,

Case No.: 3:21-cv-00663-CWR-LGI

Plaintiff,

Hon. Carlton W. Reeves
Mag. LaKeysha Greer Isaac

v.

THE CITY OF JACKSON, MISSISSIPPI;
CHOKWE A. LUMUMBA, JR.; TONY YARBER;
KISHIA POWELL; ROBERT MILLER; JARRIOT
SMASH; THE MISSISSIPPI DEPARTMENT OF
HEALTH; JIM CRAIG; TRILOGY ENGINEERING
SERVICES, LLC; AND John Does 1-40

Defendants.

**DEFENDANT, TRILOGY ENGINEERING SERVICES, LLC’S UNOPPOSED MOTION
FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO AMENDED COMPLAINT**

COMES NOW, Defendant, Trilogy Engineering Services, LLC (“Trilogy”), by and through undersigned counsel of record, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby respectfully moves for an enlargement of time to respond to Plaintiff, J.W., a minor, by and through AMANDA WILLIAMS, Guardian and Next Friend’s (“Plaintiff”) Amended Complaint and Jury Trial Demand (“Amended Complaint”), and states as follows:

1. Plaintiff filed the Amended Complaint on February 17, 2022 [ECF 51].
2. By agreement of the Parties, and upon the order of the Court, Trilogy’s deadline to file a response to the Amended Complaint is March 10, 2022 [ECF 47].
3. Plaintiff and Trilogy agreed to this request to enlarge the time to file a response to the Amended Complaint through and including April 11, 2022. An Agreed [Proposed] Order is attached hereto as *Exhibit A*.

4. Counsel for Plaintiff approves the filing of this Unopposed Motion for Enlargement of Time to File Response to Amended Complaint and the Proposed Order granting same.

5. This enlargement of time is not sought in bad faith or for the purposes of delay and will not prejudice any party.

WHEREFORE, Defendant Trilogy Engineering Services, LLC, respectfully requests that this Court enter an Order granting Trilogy Engineering Services, LLC an enlargement of time through and including April 11, 2022, to respond to Plaintiff's Amended Complaint and Jury Trial Demand.

CERTIFICATE OF CONFERRAL

Prior to filing this Motion for Enlargement of Time to File Response to Amended Complaint, the undersigned conferred with Counsel for Plaintiff, who has no objection to the relief requested herein.

Dated: March 8, 2022.

Respectfully submitted,

By: /s/ Davide Macelloni
Davide Macelloni
DANIELS, RODRIGUEZ, BERKELEY
DANIELS & CRUZ, P.A.
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 8, 2022, I electronically filed the Unopposed Motion for Enlargement of Time to Respond to Plaintiff's Amended Complaint with the Clerk of Court via the ECF System, which served copies upon all counsel and parties of record.

This the 8th day of March, 2022.

/s/ Davide Macelloni
DAVIDE MACELLONI

**IN THE UNITED STATES DISTRICT COURT
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J.W., a minor, by and through AMANDA
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Plaintiffs,

Hon. Carlton W. Reeves
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HEALTH; JIM CRAIG; TRILOGY ENGINEERING
SERVICES, LLC; AND John Does 1-40

Defendants.

**ORDER GRANTING UNOPPOSED
MOTION FOR EXTENSION OF TIME**

THIS MATTER, having come before the Court on Defendant, Trilogy Engineering Services, LLC's ("Trilogy") Unopposed Motion for an Enlargement of Time to File Response to J.W., a minor, by and through AMANDA WILLIAMS, Guardian and Next Friend's Amended Complaint [ECF No. 56], and the Court, being advised that the Parties are in agreement to same, does hereby find that said Motion is well-taken and should be granted.

IT IS THEREFORE ORDERED AND ADJUDGED that Trilogy shall have an enlargement of time through April 11, 2022, to respond to the Amended Complaint [ECF No. 51].

This the ____ day of March, 2022.

LAKEYSHA GREER ISAAC
UNITED STATES MAGISTRATE JUDGE